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**WORK PLAN**

**NELSON KNITTING SITE**  
**ROCKFORD, WINNEBAGO COUNTY, ILLINOIS**

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Prepared for:



ATTN: Robert Kondreck  
U.S. EPA  
Region V  
Emergency Response Branch  
Superfund Division  
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## 1. INTRODUCTION

Environmental Quality Management, Inc. (EQM) has been tasked with performing a time-critical removal action (TCRA) at the Nelson Knitting Site (Site), in Rockford, Winnebago County, Illinois 61101 under Emergency Response and Rapid Services (ERRS) Contract No. 68HE0422D005, Task Order No. 68HE0523F0022 with the United States Environmental Protection Agency (EPA) Region 5. This TCRA will mitigate threats to public health, welfare, and the environment posed by the release of uncontrolled hazardous substances at the Site. The complete scope of work for the TCRA is outlined in an Action Memorandum dated November 30, 2022 (EPA Region 5).

The former Nelson Knitting Site is located at 909 S. Main St, in Rockford, Winnebago County, Illinois. The site formerly operated as a sock knitting mill from 1926 to 1990, then was mostly unused from 1990 to the present. The Site consists of one parcel of land and is approximately two (2) acres in size. Winnebago County is the current site owner, purchasing the property through tax delinquency on October 17, 2022. Mr. John Cook, III purchased the Site in 1999 and then transferred ownership to Nelson-Cook Building Co., LLC, of which he is the principal, in 2022. Since business operations ended in 1990, the site has remained vacant and is degrading. Site assessments have confirmed the presence of deteriorating friable ACM throughout the site as well as other regulated waste items.

The site consists of a dilapidated three-story industrial building with a collapsing roof. The City of Rockford elected to condemn and secure the site in June 2020; however, trespassers have continued to surreptitiously enter the building. Site assessments by the city and EPA have found evidence of scrapped building materials and asbestos debris littering the floor. Additionally, the site contains polychlorinated biphenyls (PCB) lighting ballasts, lead acid batteries, miscellaneous chemicals, and fluorescent light tubes.

## 2. SITE MANAGEMENT AND COMMUNICATIONS

The EQM Program Manager (PM), Response Manager (RM), and Field Cost Administrator (FCA) will be the primary management points of contact for the EPA. The PM will ensure the RM has the proper resources needed to complete the task order and ensure technical support from the program management office. The RM will be the primary point of contact for the EPA On-Scene Coordinator (OSC) and will direct the field crew in safe day-to-day field operations as well as coordinate with vendors and subcontractors on the timely delivery of goods and services. The FCA will be responsible for task order cost tracking; maintaining project files; and procuring equipment, materials, and subcontracted services.

Site operations will typically be conducted Monday through Friday from 7:00 am to 5:30 pm. This is a 10-hour workday that results in 40 hours per week of straight time and 10 hours per week of overtime.

The EQM RM will manage site activities and provide ongoing communication with field team members, subcontractors, vendors, the START representative, and the EPA OSC on an as-needed basis. The five most common management tools used on a daily or weekly basis will be:

- **Work Order**—The EQM RM will prepare work orders daily to document planned work activities for the following day and work accomplished on the current day. SCA/DBA work hours, labor, and equipment resources required for each day will be documented. Completion of unscheduled work or the addition of resources will be tracked on the amendment section of the work order form.
- **Safety**—The EQM RM will conduct an initial safety orientation meeting to review the Site Safety Plan and work practices prior to the start of work activities. A daily Tailgate Safety Meeting will be held with the crew to review daily work assignments and safety hazards associated with work activities. The RM will prepare the daily safety briefing agenda, and crew members will sign an acknowledgement form that they attended the meeting and understood the daily safety meeting topics.
- **Cost Tracking**—The EQM FCA will prepare a 1900-55 daily cost report using RCMS cost tracking software. Costs will be compiled from employee work hours, equipment and materials utilized, and subcontractor services performed for each day. The FCA will typically complete the cost report by 10:00 am the following morning for the previous day's work activities and will forward the report to the EPA OSC for his/her review and concurrence. The cost report will be supported by attaching documentation to validate daily

costs such as sign-in/sign-out logs, work orders, vendor and subcontractor invoices, disposal weight tickets and shipping documents, and vendor packing lists.

- **Construction Schedule**—EQM has prepared an initial construction schedule to demonstrate the sequence of work activity completion and the associated time frame and duration of when activities will be performed. Work activities will be reviewed on a weekly basis and the schedule will be updated to track work completed and changes to the work schedule. A copy of the initial construction schedule is in Appendix A.
- **Tracking Logs**—The EQM RM and FCA will prepare the following tracking logs to document site activities. These logs will be kept for work items that relate to project cost or safety.
  - **Disposal Tracking Log**—This log will track truck numbers, manifest/bill of lading numbers, driver arrival/departure times, and volume and/or tonnage.
  - **Site Sign-in/Sign-out Log**—This is a multi-purpose log used to record site billable hours and is a safety form to inventory who is present on site to account for all site workers and subcontractors in case of an emergency.
  - **Green Metrics Log(s)**—These logs are used to track green metrics such as use of alternative fuels, recycled materials, and water usage.

### **3. SCOPE OF WORK AND TECHNICAL APPROACH**

EQM's scope of work and technical approach are crafted to meet regulatory and contract requirements as well as site removal goals and objectives. The scope of work and technical approach presented are for known work determined during the Action Memorandum of historical site visits. EQM will perform the following tasks:

- Initially mobilize one Response Manager, one equipment operators, and three laborers. EQM's field cost administrator will initially work remotely from the site and may be mobilized as needed throughout the project if the scope of work expands.
- Site ACM Debris removal: The asbestos including ACM-impacted wastes, and RACM at the Site is contained within the structures on the property. Both the ACM and RACM will be consolidated, loaded, and transported for disposal.
- Load, transport and dispose of identified hazardous substances, pollutants, or contaminants and other universal waste (PCB lighting ballast, lead acid batteries, miscellaneous chemicals, and fluorescent light tubes).
- Provide, install, and remove (at project completion) site facilities, utilities, and temporary infrastructure improvements.

#### **3.1 Premobilization Activities**

EQM will prepare to mobilize to the site on January 30, 2023. EQM will complete many activities remotely in preparation for site operations. The following subsections describe premobilization activities.

##### **3.1.1 Plans**

In addition to this Site Work Plan, EQM will prepare a Site Safety Plan that will provide:

- Site background information
- General safety procedures and requirements
- Training requirements
- Medical and heat and cold stress monitoring requirements
- Personnel decontamination procedures and requirements
- Levels of protection
- Contaminants of concern information
- Emergency contact information and procedures

- Accident and incident reporting forms
- Activity Hazard Analysis
- Material Safety Data Sheets.

### **3.1.2 Resource Procurement**

The EQM PM, RM, FCA, and program office staff will work to collectively procure the site resources required to sustain site operations and complete the TCRA goals. The EQM PM and RM will identify the labor equipment and material resources required for the task order, and the EQM PM or designate will acquire the necessary resources. EQM will utilize in-house and team subcontractor labor and equipment resources for ACM debris removal and load out ACM debris. Additional equipment resources will be procured from local and regional vendors. EQM will procure site materials as well as subcontractors and other resources from regional and local vendors. These resources include:

- Electrician subcontractor for installation
- Site sanitation facilities
- Site heavy equipment
- Expendable personal protective equipment.

EQM will competitively bid procurements based on best value by using evaluation criteria such as low cost, timely schedule, and experience.

## **3.2 Mobilization**

### **3.2.1 EQM Labor Mobilization**

EQM plans to provide the RM, FCA, one equipment operators, and three laborers. These personnel will be mobilized from their respective home offices. Travel time for these employees will be charged up to the equivalent amount of time to mobilize from our Cincinnati office if mobilization travel time exceeds the mobilization travel time from Cincinnati. These employees will require per diem and lodging while working on site. EQM will transport the RM, Foreman, and FCA in company-provided vehicles.

### **3.2.2 Equipment and Other Resource Mobilization**

EQM will locally lease office trailers, 45 kVA generator, porta-potty restrooms, one track skid steer loader, and one walk-behind track loader.

### **3.3. Site Resource Summary**

EQM has prepared the Resource Plan presented in Appendix B to summarize the type, quantity, origin, and utilization for labor, equipment, and materials.

### **3.4 Site Preparation**

EQM based the type and extent of site preparation requirements on our understanding of the scope of work for this TCRA. EQM expects work activities to be completed within 4-6 weeks from initial mobilization.

#### **3.4.1 Facilities and Utilities**

The following facilities and utilities will be provided:

- **Office Trailers**—EQM will mobilize and rent two 8-ft by 20-ft office trailers. One trailer will be for the EPA OSC and START offices, and one trailer will be for EQM offices and the crew break area.
- **Electrical Service**—EQM will procure a portable 45-kVA generator from a local vendor to supply electrical power for the office trailer and other site needs. Electrical generator power will only be used during site working hours and will be shut down during non-working hours. An electrician subcontractor will be locally procured to make electrical connections.
- **Phone and Internet Service**—Cellular phones will be used for phone service. EQM will provide Jetpacks for internet service.
- **Site Sanitation and Other**—EQM will provide two portable toilets with weekly service. EQM will provide separate receptacles in the office and break areas to collect trash and recyclable plastic and paper products. Collected products will be taken to the local recycling facility.



### 3.4.2 Site Controls

EQM will install the following site controls to maintain safety and protect the environment:

- **Work Zone Delineation**—Traffic barricades, barrier tape, and signage will be used to delineate the perimeter of the work zones and restrict unauthorized entry. Signs such as Keep Out and Authorized Entry Only will be affixed to the fencing to further delineate work areas.
- **Support Zone/Contamination Reduction Area**—EQM will provide tables, and chairs for this area, and store emergency response equipment such as a first-aid kit, eye-wash station, and personal protective equipment. Trash receptacles and plastic sheeting will be provided for dry decontamination of personnel exiting work zones. Disposable personal protective equipment (PPE) will primarily be used to protect site workers from exposure to site hazards. Disposable PPE will consist of Tyvek coveralls, poly-coated Tyvek coveralls (for wet decontamination work), nitrile gloves, and PVC booties.
- **No Idling Policy**—To minimize carbon emissions, EQM will implement, when practical, a no idling policy for site trucks and heavy equipment.
- **Spill Response and Control Kit**—EQM will provide and maintain two spill control and response kits for the site. The kits will consist of an open-top steel or plastic drum that contains several bags of oil dry, adsorbent boom, and pads for cleaning up machinery fluid spills and releases. One kit will be staged near the transition entrance to the work area where daily fueling of equipment will take place. This location has the highest potential for a release occurring. A second kit will be staged near the active work area. This kit will be used to address minor equipment fluid releases resulting from a damaged hydraulic hose. This is the second most likely potential for release at a work site.

### 3.4.3 Clearing and Grubbing

To prepare the site for operations, EQM will provide a tracked skid-steer to move clean debris piles that obstruct work activities and will be moved outside work zones and left in place.

### 3.4.4 Illumination and Ventilation

The site work is anticipated to be conducted in natural ventilation. EQM will provide light stands, a portable generator, ground fault circuit interrupters (GFCI), and electrical drop cords to illuminate active work areas and traffic routes for moving ACM debris. When practical, the drop cords will be affixed to structural elements above the floors of the building to minimize cord contact with water accumulations and prevent trip hazards. Drop cord connections will be wrapped with plastic and duct tape to further minimize electrical cord contact with water, and GFCIs will be used to minimize electrical shock hazards.

### **3.4.5 Mitigation of Structural Hazards**

Site workers may face multiple types of structural hazards remaining from the building demolitions. These hazards can be classified as:

- Slip, Trip, and Fall—The grounds are covered with debris and have depressions and elevation changes. The first phase of the TCRA will address the removal of the ACM debris; preparatory work may be needed to minimize hazards prior to ACM debris removal.

These hazards will be assessed, and controls will be implemented prior to conducting ACM debris removal operations. These controls may consist of the following:

- Slip, trip, and fall hazards may be dealt with in numerous ways as appropriate for the individual hazard. When possible, removal of the hazard will be the primary method. Hazards will be flagged and/or marked with caution tape, fluorescent spray paint, and signage to draw attention to the hazard.

## **3.5 Construction Debris Removal**

### **3.5.1 ACM Debris Pile Removal**

EQM's objective is to remove as much ACM debris as possible and minimize the risk of ACM release into the environment. Various debris materials contaminated with ACM are dispersed over the expanse of the site within several piles. EQM equipment operators and laborers may use a mini-skid steer loader, walk behind track loader, and wheelbarrows to remove the ACM debris from the site and load it into roll-off containers for disposal at a CERCLA Off-Site Rule compliant Subtitle D landfill. ACM debris removal and handling techniques and equipment may vary slightly as work progresses so that conditions can be adjusted to maximize safety and efficiency. Wetting will be performed prior to disturbing any material as standard practice. Whenever possible, ACM debris will be recovered with mini heavy equipment and transferred into double-lined roll-off shipping containers. Manual labor may be used to recover ACM debris in areas where mini-heavy equipment cannot be used because of space limitations and/or as detailed clean up.

Roll-off waste shipping containers will be staged in the parking area. EQM plans to have a track skid-steer loader on site to be the primary transfer method for ACM debris to roll-offs, where off-site disposal trucks can access them to transport waste to the landfill. Each roll-off will

have two liners fitted inside to contain the ACM waste. Liners will be sealed, and labels affixed once the box is loaded prior to being shipped off site for disposal. Plastic sheeting will be placed on the ground on both sides of the boxes to contain spills during box loading.

Wetting will occur in a manner sufficient to have no visible emissions to the outside air during the collection, processing packaging, transporting, or deposition of any asbestos-containing waste material.

Workers will complete debris removal work while wearing Level C personal protective clothing/equipment. Debris will be scraped up with the bucket of the tracked skid steer loader and/or hand shoveled. A water mist will be applied to the debris as removal operations are ongoing, to suppress dust and when debris is deposited into roll-off containers. Large debris objects and recyclable scrap metal will be sprayed with water and segregated from debris being sent off site for disposal as ACM-contaminated material.

### **3.5.2 Bagged ACM Removal**

Bagged ACM debris will be removed in a similar manner. A worker and hand shovel can be used to move material into the bucket to assist with transfer into a double-lined roll-off container. The remaining ACM demolition debris will be loaded and transported off site to an approved disposal facility. Some site layout features may be modified such as relocating the personnel decontamination and support zone and expanding the work zone boundary. After the ACM debris is removed, EQM will demobilize most, if not all, field laborers, equipment operators, and equipment used to remove ACM. Equipment will be decontaminated on site using dry decontamination methods. The equipment will be wiped down and the material used for wiping the equipment down, will be collected and disposed along with the ACM collected onsite.

## **3.6 Site Restoration**

Site restoration will be limited to repairing damage from site operations caused by EQM's site activities.

### **3.7 Final Demobilization**

The remaining equipment and temporary infrastructure will be removed from the site upon completion of debris disposal, site restoration, and repairs. The RM will be demobilized following demobilization of site equipment, facilities, and infrastructure.

## **FIGURES**

## **APPENDIX A**

### **INITIAL CONSTRUCTION SCHEDULE**

- January 30, 2023 – Mobilize to job site
- Week ending February 05, 2023 – Site setup, delivery of trailers and heavy equipment. Start collecting light ballast, consolidation of ACM, sample hazardous liquids for analysis
- February 06, 2023 – March 05, 2023 – Consolidation of ACM, load ACM into roll-off boxes for disposal. Collect light tubes and light ballast, package, and ship for disposal. Package and ship for disposal remaining hazardous waste.
- Week ending March 12, 2023 – demobilize equipment and trailers, personnel, and any remaining roll-off boxes and or hazardous waste.

**APPENDIX B**  
**SITE RESOURCE PLAN**